REMARKS

Favorable reconsideration of this application is requested in view of filing a Request for Continued Examination and the required submission of the above amendments and the following remarks. Claims 1, 2, 4, 6, 9, 10 and 30 are amended. Applicants did not add new matter when amending claims 1, 2, 4, 6, and 30. Support in the originally filed specification for the at least one central processing unit and the connected memory is given on page 4, line 18 which states that the invention uses "a single enterprise-wide framework." In the parlance of information technology, an enterprise is at least one computer processing unit and at least one memory connected to it. Applicants did not add new matter when amending claims 9 and 10. Support in the originally filed specification for the linking the business directions component to the business capabilities component is given in Figure 5. Claims 1, 2, 4, 6, 9, 10 and 13-30 are pending.

The rejection under 35 U.S.C. §101

Claims 1-2, 4-6, 18-29 and 30 are rejected as being directed to nonstatutory subject matter. Applicants do not concede the correctness of the rejection. Nevertheless, Applicants amend claims 1, 2, 4, 6 and 9 so that the enterprise architecture model comprises at least one computer processing unit and at least one connected memory and that the database is stored in at least one memory and accessible by at least one computer processing unit.

Applicants request the rejection under 35 U.S.C. §101 be withdrawn. Applicants invite the Examiner to telephone the Attorney to suggest other language that may be more acceptable. Claims 2, 4-6, 18-29 are at least allowable by virtue of their dependence upon independent claim 1.

Applicants further note that claim 1-2, 4-6, 18-29 are rejected only under 35 USC. §101; therefore Applicants, believing that the claims are statutory, request these claims be allowed.

The rejection under 35 U.S.C. §112, second paragraph

In response to the rejection of claims 9-10, 13-17 as being indefinite for failing to particularly point out and distinctly claim the subject matter of the invention, Applicants amend claim 9 to provide a step that links the organization direction component to the organization capabilities component as shown in Figure 5. Applicants have clarified that there are business architecture data and information technology data. Consistent with the definition of components presented in the response after a final rejection mailed on 11 August 2008, the organization components encapsulate the organization data and the algorithms applied to them. Applicants request the rejection of claims 9-10, 13-17 be withdrawn.

In order to preclude any rejections of claims 1, 2, 4, 6, and 30 under 35 U.S.C. §112, second paragraph, Applicants assert that, in a computer enterprise system (claim 30) and in a computer enterprise model (claim 1), one or more computer processing units are typically connected to one or more memories. In an enterprise system, moreover, the same component may execute on one or more processor simultaneously or sequentially, likewise different memories may be accessed simultaneously or sequentially. Thus, Applicants do not limit the claims to one computer processing executing a particular component nor to storage or accessibility to one particular memory.

The rejection under 35 U.S.C. §103(a)

Applicants traverse the rejection of claims 9-10, 13-17 as being obvious over Cornelius '234 in view of Adler '685. The rejection admits that Cornelius '234 does not teach a "computerized" method but then relies on Adler '685 for providing a computerized process for modeling and analyzing strategic business decisions.

Applicants traverse because neither Cornelius '234 nor Adler '685 teach or suggest storing the information technology architecture of the organization in a database, operationally linking the information technology data to the business information component, and then assessing the impact on one architecture resulting from changes to the other environment, as required by claim 9. With respect to implementing change, Cornelius '234 at column 61, lines 12-35 states the ripple-effects must be understood and

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coordinated and then Cornelius '234 proposes to make the Architecture team responsible for all ripple effects and have them implement all the application level changes that result from an architecture modification. This statement is the mere disembodied abstract idea that does not mention or suggest the impact on the business architecture; in actuality, this statement is a statement of the need for Applicants' claimed invention. Note that Applicants' invention, as claimed, will evaluate far greater and deeper impacts than those at the application level, which is what is suggested by Cornelius '234.

Adler '658 is cited for providing a web-based method of modeling strategic business decisions. Adler '658 is specifically directed to simulating business decisions in the realm of economics, e.g., B2B channel strategies, mergers and acquisitions, creating or dropping products, business units or production capacity, simulating trends in the market and overall economy, joining an existing market, etc. see page 4, ¶[0032]. Adler '658 does not model or evaluate the impact of changes on or resulting from changes in the information technology architecture. Specifically, *see* pages 9-10 and ¶s [0081] through [0084] where Adler '658 briefly discusses the development tools needed to implement the method to model strategic business decisions. Note, however, that Adler '658 specifically does not address the impact of any changes in the information technology architecture and the development architecture on the business decisions.

Because neither Cornelius '234 nor Adler '658 teach or provide a reason to evaluate the impact of changes in the information technology architecture on a business architecture and *vice versa*, their alleged combination cannot do so. Applicants request the withdrawal of the rejection of claims 9-10, 13-17 as being obvious over Cornelius '234 in view of Adler '658 because a prima facie case of obviousness has not been established. Applicants assert that claims 10, 13-17 are allowable at least because of their dependence upon claim 9. Applicants do not concede the correctness of the rejection.

Applicants request the Examiner review the amended claims, consider the remarks above, and allow the claims. The Examiner is further invited to telephone the attorney, Karuna Ojanen Reg. No. 32484 at 612.455.3836 if there is suggested claim language or are minor issues that can be resolved to pass this long-pending application to issuance.

Applicants authorize the Commissioner to charge payment of any additional filing fees required under 37 CFR 1.116 and any patent application processing fees under 37 CFR 1.117 associated with this communication or credit any overpayment to Deposit Account 09-0457.

Respectfully submitted,

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PATENT TRADEMARK OFFICE
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HAMRE, SCHUMANN, MUELLER & LARSON, P.C.
P.O. Box 2902
Minneapolis, MN 55402-0902
(612) 455-3800

Dated: 11 September 2008   By: /Karuna Ojanen/
                                    Karuna Ojanen
                                    Reg. No. 32,484
                                    KO/ad